

FCC MAIL SECTION

FEB 3 8 05 AM '97

Before the
Federal Communications Commission
Washington, D.C.

In the matter of

A petition to amend the FM table
of assignments to add channel 221A
to St. Maries, Idaho

January 21, 1997

These comments are filed by:
Spokane Public Radio, Inc.
2319 N. Monroe St.
Spokane, WA 99205

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AUDIO SE. RES. DIVISION


Spokane Public Radio, Inc. herein files its objection to amending the table of assignments to add channel 221A to St. Maries, Idaho and proposes that channel 278A be added instead.

Spokane Public Radio's consulting radio engineer has determined that the above referenced amendment of the table will conflict with its application, currently on file with the Commission, to improve the facilities of its KSFC, channel 220, Spokane.

The attached engineering statement made by Doug Vernier, broadcast engineering consultant, indicates that an alternate channel exists that would provide St. Maries with its first service, channel 278. If assigned as requested, the proposed allocation will meet all spacing requirements as per section 73.207 of the Commission's Rules and Regulations. The site, restricted as proposed, will serve the entire city of St. Maries with a signal strength of at least 3.16 mV/m.

Spokane Public Radio, Inc. encourages the Commission to adopt this proposal which will allow its Spokane service to be improved and at the same time provide for a new first service at St. Maries, Idaho.

Under the penalty of perjury, I declare that the foregoing is correct.


Richard Kunkel, CEO
Spokane Public Radio, Inc.

(date) January 28, 1997

Sworn to and subscribed before me
this 28 day January, 1997



Carrie M. Everman Notary Public
Carrie M. Everman
My commission expires: 11-22-97

January 28, 1997

A copy of these comments has been sent by certified mail to:

Pentacle Investment Co.

Engineering Statement:

On, December 10, 1996, the FCC received an application for filing that was submitted by Spokane Public Radio, Inc. of Spokane, Washington to upgrade the facilities of its licensed facility, KSFC (ARN 961210MC). KSFC operates on channel 220. We note that this class C2 upgrade proposal will be in conflict with a proposal to allocate channel 221A to St. Maries, Idaho which was announced at approximately the same time. The distance between the proposed KSFC transmitter site and the proposed St. Maries allocation is 61.87 kilometers, while the FCC requires a minimum distance of 106 kilometers between the facilities.

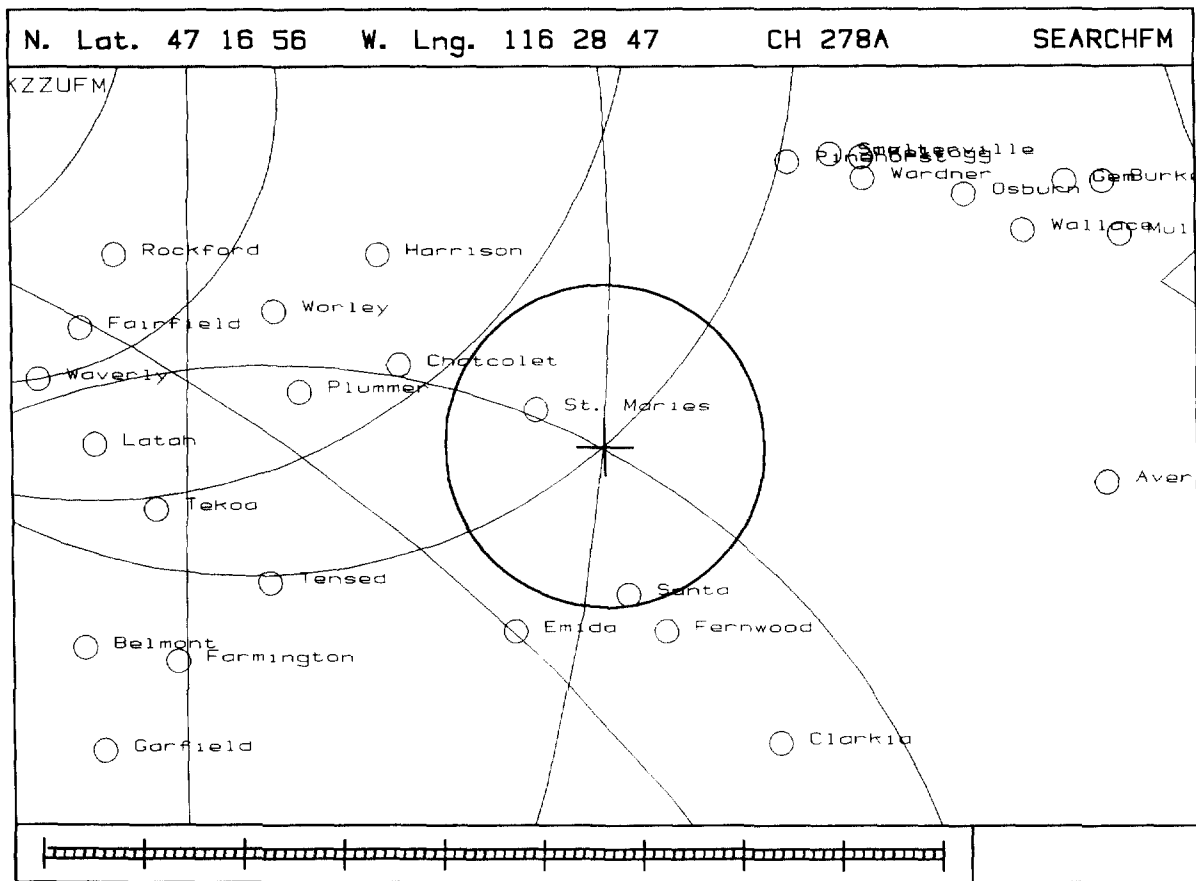
We have been asked by Spokane Public Radio, Inc. to study the FM band at or near St. Maries, Idaho to determine if an alternative to channel 221 exists. Our study has identified channel 278. Under a site restriction of 8.08 kilometers southeast (approx 116.83 Deg True) channel 278 could be allocated. From this site a station operating on channel 278 could provide a 3.16 mV/m over the entire city of St. Maries.

We have provided a channel spacing study (attachment #1) for channel 278 to show that all minimum spacing requirements of the Commission are fully met.

Attachment #2 is a map of a station's 3.16 mV/m signal contour located at the proposed, site restricted, allocation site operating with an antenna height above ground of approximately 100 meters at 6 kW. (AMSL = 983.6 meters, HAAT = 26 meters.) It can be seen that the 70 dBu signal from this facility travels nicely along the valley and falls well past St. Maries. Therefore, the entire city of St. Maries will be within the proposed 3.16 mV/m signal.

Channel 278A could be allocated at St. Maries and therefore remove the conflict with the application from Spokane Public Radio, Inc. which is currently on file with the Commission

Doug Vernier



Call	CH#	Location		D-KM	Azi	FCC	Margin
KCDA	276C2	Coeur d'Alene	ID	55.10	319.9	55.0	0.10
ALOPEN	278C1	Wilson Creek	WA	200.10	275.2	200.0	0.10
AD277	277A	Moscow	ID	72.18	207.7	72.0	0.18
KNJY.C	280C2	Spokane	WA	71.58	313.9	55.0	16.58
KWHT	278C1	Pendleton	OR	219.76	221.9	200.0	19.76
KZZUFM	225C	Spokane	WA	70.85	299.8	29.0	41.85
KNJY	280A	Spokane	WA	90.90	301.0	31.0	59.90
KVAB.C	275A	Clarkston	WA	103.19	207.5	31.0	72.19
AL278	278A	Nelson	BC	257.27	346.7	132.0	125.27
ALOPEN	279C1	Pendleton	OR	219.76	221.9	133.0	86.76
AL279	279A	Yahk	BC	202.09	7.8	85.0	117.09
KVYF	277C3	Wilson Creek	WA	190.68	270.8	89.0	101.68
KOFIFM	280C1	Kalispell	MT	188.89	60.6	75.0	113.89
AL277	277A	Grand Forks	BC	239.07	324.3	85.0	154.07
AL275	275B	Creston	BC	202.14	359.2	69.0	133.14
AD279	279B	Rock Creek	BC	293.80	316.6	132.0	161.80
KORTFM	224C3	Grangeville	ID	160.08	170.1	12.0	148.08
AL281	281B	Trail	BC	221.55	336.3	69.0	152.55
AL277	277A	Kimberley	BC	269.51	7.6	85.0	184.51
A0279	279A	Rock Creek	BC	270.47	317.3	85.0	185.47
DE279	279A	Rock Creek	BC	270.47	317.3	85.0	185.47
KXDD	281C1	Yakima	WA	310.82	255.4	75.0	235.82
KXDD.C	281C	Yakima	WA	332.22	258.9	95.0	237.22
KOMWFM	224C2	Omak	WA	256.54	297.9	15.0	241.54
AL275	275B	Oliver	BC	314.09	312.3	69.0	245.09
CJORFM	275B	Oliver	BC	314.09	312.3	69.0	245.09

Declaration:

I, Doug Vernier, declare that I have studied engineering at the University of Michigan and have received degrees from the University in the field of Broadcast Telecommunications. That, I have been active in broadcast consulting for over 23 years;

That, I have held a Federal Communications Commission First Class Radiotelephone License continually since 1964. In 1985 this license was reissued by the Commission as a lifetime General Radiotelephone license no. PG-16-16464;

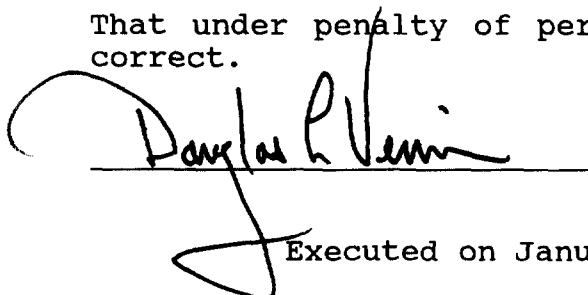
That, I am certified as a Professional Broadcast Engineer (#50258) by the Society of Broadcast Engineers, Indianapolis, Indiana. (Recertified 11/95.)

That, my qualifications are a matter of record with the Federal Communications Commission;

That, I have been retained by Spokane Public Radio, Inc. of Spokane, Washington to prepare the engineering showings appended hereto;

That, I have prepared these engineering showings, the technical information contained in same and the facts stated within are true of my knowledge;

That under penalty of perjury, I declare that the foregoing is correct.

 Douglas L. Vernier

Executed on January 17,